

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Richmond Division

UNITED STATES OF AMERICA

v.

CASE NO.: 4:24CR18

RICKY DAMION CHRISTOPHER JONES, JR.

Defendant.

NOTICE AND MOTION TO WITHDRAW AS COUNSEL

TAKE NOTICE that on March 28, 2024 or as soon thereafter, Counsel for Defendant, Ricky Damion Christopher Jones, Jr., (the “Defendant”), will move this Honorable Court to enter an order allowing Counsel to withdraw from this matter as Defendant’s attorney. In support thereof, the Defendant represents as follows:

1. Defendant was arrested on March 19, 2024.
2. Defendant’s family reached out to Counsel immediately after the Defendant’s Arrest to retain Counsel on these pending charges.
3. Counsel has been representing the Defendant on his pending state charges.
4. Defendant’s family was able to retain for the Detention hearing set for March 28, 2024.
5. Defendant’s family has advised Counsel that they cannot pay the additional funds to continue with Counsel’s representation.
6. Defendant would like to see if he qualifies for a Court Appointed Attorney in light of the financial difficulties his family is having to retain private Counsel.
7. This motion is not prejudicial to the Government since the Defendant’s arraignment is March 28, 2024 and no discovery has been provided at this time.

8. Counsel has conferred with Attorney Podlesni and she does not object to this motion.

WHEREFORE, defendant respectfully prays for the entry of an order in accordance with this motion.

RICKY DAMION CHRISTOPHER JONES, JR.

By /s/ Diane P. Toscano
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Counsel for Ricky Jones, Jr.

CERTIFICATE OF SERVICE

I certify that on this 27th day of March 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification (NEF) to:

Julie Podlesni, Esquire
United States Attorney's Office
Eastern District of Virginia Newport News Office
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Attorney for the United States

By /s/ Diane P. Toscano
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